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*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN FRANCISCO DIVISION

GOOGLE LLC,  
  
Plaintiff and Counter-defendant,  
  
v.  
  
SONOS, INC.,  
  
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT  
ROBERTS IN SUPPORT OF SONOS,  
INC.'S ADMINISTRATIVE MOTION  
TO FILE UNDER SEAL RE MOTION  
TO STRIKE**

1 I, Clement Roberts, declare as follows and would so testify under oath if called upon to do  
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good  
5 standing of the Bar of the State of California. I make this declaration based on my personal  
6 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set  
7 forth herein.

8 2. I make this declaration in support of Sonos’s Administrative Motion to File Under  
9 Seal in connection with Sonos’s Motion to Strike Portions of Google’s Expert Invalidity and  
10 Noninfringement Reports (“Sonos’s Motion”).

11 3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEAL	DESIGNATING PARTY
Exhibit J to Sonos’s Motion	Portions outlined in red boxes	Sonos and Google

16 4. The portions of Exhibit J to Sonos’s Motion to Strike outlined in red boxes contain  
17 references Sonos’s confidential business information and trade secrets, including terms to a  
18 confidential agreement that is not public. Disclosure of this information would harm Sonos’s  
19 competitive standing by giving Sonos’s competitors highly sensitive information about Sonos’s  
20 business dealings with other entities. A less restrictive alternative than sealing the portions of  
21 Exhibit J to Sonos’s Motion to Strike, as indicated in the table above, would not be sufficient  
22 because the information sought to be sealed is Sonos’s confidential business information and  
23 trade secrets and is integral to Sonos’s legal arguments.

24 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
25 knowledge. Executed this 27th day of January, 2023 in Belevedere, California.

27 /s/ Clement S. Roberts  
28 Clement S. Roberts